

RE: WCH DEA response Re; audit 2011

From:

"Meunier, Kevin" <kevin.meunier@mckesson.com>

To:

"Hilliard, Gary" <gary.hilliard@mckesson.com>, "Gustin, Dave" <dave.gustin@mckesson.com>

Cc:

"Pitakos, Becky" <becky.pitakos@mckesson.com>, "Terry, Thomas" <thomas.terry@mckesson.com>, "Walker, Donald" <donald.walker@mckesson.com>, "Trugman, Ina" <ina.trugman@mckesson.com>, #PGRDRC <pgrdrc@mckesson.com>, "Sears, Jess" <jess.sears@mckesson.com>

Date:

Mon, 28 Nov 2011 17:05:29 +0000

Attachments:

DEA Response 11-23.PDF (12.77 kB); DEA letter Certified mail receipt.PDF (22.55 kB)

Gary,

Attached is the signed letter that we sent certified mail to the DEA on 11/22/2011 as well as the return receipt. We have the certified mail receipt showing the letter was signed for by J. Thomas on 11/23/2011 at their Columbus, OH office. Let me know if there is anything else that you need.

Kevin Meunier

DC Manager

Washington Court House, OH

Office direct phone: 740-636-5127

Office cell: 573-582-4686

From: Hilliard, Gary

Sent: Monday, November 28, 2011 11:26 AM

To: Gustin, Dave; Meunier, Kevin

Cc: Pitakos, Becky; Terry, Thomas; Walker, Donald; Trugman, Ina; #PGRDRC; Sears, Jess

Subject: RE: WCH DEA response Re; audit 2011

Kevin,

I cannot find an email where you confirmed the submission of the DEA response. Please make sure you have copied us on the signed letter and the POD for DEA's receipt.

Thanks,

Gary Hilliard, CHMM

Director of Regulatory Affairs

McKesson Corporation

900 Dylan Ct.

Burleson, TX 76028

817-447-0649

817-447-2812 fax

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From: Gustin, Dave

Sent: Tuesday, November 22, 2011 12:16 AM

To: Meunier, Kevin

Cc: Pitakos, Becky; Terry, Thomas; Walker, Donald; Trugman, Ina; #PGRDRC; Sears, Jess

Subject: WCH DEA response Re; audit 2011

Kevin,

Please see the attached response. It has been through all the proper channels and is ready for you to read, approve and send on to The DEA in response to the two audit violations. Please do this right away and copy me that it has been done as it is of paramount importance.

Regards

Dave Gustin DRA North Central

937 840 8553

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MC-WV-02158

Mr. Robert L Corso
Special Agent in Charge
Detroit Field Division
US Department of Justice
Drug Enforcement Administration
Columbus District Office
500 S Front St, Suite 612
Columbus, Oh, 43215

November 21, 2011

Re: Letter of October 28, 2011

Dear Mr. Corso,

This letter responds to the on-site investigation occurring from March 31 to April 12, 2011 at McKesson Corporation's Distribution Center (registration RM0220688) located at 3000 Kenskill Ave, Washington Court House, Ohio, 43160 and your subsequent letter of October 28, 2011 noting two discrepancies.

McKesson Corporation takes its compliance responsibilities seriously and will continue to maintain policies and procedures to comply with all DEA regulations. The following responds to the two discrepancies noted in your letter.

1. *"Failure to activate control substance cage and vault electronic alarm monitoring when employees were not present in violation of Title 21 Code of Federal regulations, Sections 1301.71(a)(9), 1301.72(a)(3)(iv), and 1301.72(b)(4)(v), which states that controlled substance storage areas shall be equipped with electronic alarms to detect unauthorized entry.*

Effective immediately, adjustments to the schedules and policies of cage and vault personnel will ensure that authorized personnel will remain in the cage and vault area during any period when the alarm system is not active. Secondly, we have engaged McKesson Corporate Security to discuss modifications to the existing cage/vault security system. Separation of the cage vault motion detectors from the cage vault perimeter would allow the system to be activated during working hours without activation of the motion sensors. In accordance to Title 21 Code of Federal regulations, Sections 1301.71(a)(9), 1301.72(a)(3)(iv), and 1301.72(b)(4)(v), activating the control substance storage areas perimeter alarm will detect unauthorized entry. During non-working hours both zones for motion and perimeter alarms are activated. We will contact your office to review any plans for such modifications to ensure compliance with DEA requirements.

2. *Failure to report suspicious controlled substance orders in violation of Title 21, Code of Federal regulations, Section 1301.74(b), which states that the registrant shall inform the DEA of suspicious orders.*

Pursuant to the Memorandum of Agreement signed with the DEA, McKesson electronically transmits all reports of suspicious orders to DEA headquarters in Washington. To date, McKesson has submitted 22 reports of suspicious orders to DEA and has terminated 22 customers. McKesson has invested significant resources to continually improve our suspicious order monitoring processes. These procedures include a process for identifying orders of interest that are then subject to further investigation and review. If the order is determined to be suspicious, it is then reported to DEA. In order to continue to improve communications with your office, the Washington Court House management will also notify the Columbus DEA office on any suspicious orders that are reported to DEA headquarters.

McKesson has also refined our program to conduct reviews of customers of interest and is attempting to improve our analytical capabilities to ensure that distribution of controlled substances are consistent with legitimate medical need. We would welcome the opportunity to work collaboratively with the DEA on this effort and solicit any additional guidance you could provide in this area. We would like to set up periodic briefings with the DEA to accomplish this objective.

We look forward to working closely with your office. Please do not hesitate to contact me at 740-636-5127 should you have any questions or need additional information.

Sincerely,



Kevin Meunier
Distribution Center Manager

UNITED STATES POSTAL SERVICE
COLUMBUS OH 430



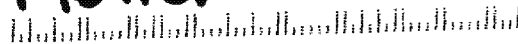
First-Class Mail
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USPS
Permit No. G-40

23 NOV 2011 PM 3 L

• Print your name, address, and ZIP Code in this box •

MCKESSON
3000 KENSKILL AVE
WASHINGTON C H OH 43180

ATTN: Kevin Marnier
Audit letter



Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: DEA Robert Corso 500 S Front St Ste 612 Columbus OH 43215	4a. Article Number 7010 0780 000065510686	
	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name) J Thomas	7. Date of Delivery 11-23-11	
6. Signature: (Addressee or Agent) X J THOMAS	8. Addressee's Address (Only if requested and fee is paid)	

PS Form 3811, December 1994 102595-98-B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.